

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

RYANNE MCNEESE,

Plaintiff,

v.

LONE STAR COLLEGE SYSTEM,

Defendant.

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Civ. A. No.: 16-2810

**JOINT MOTION TO POSTPONE ALL DEADLINES AND TO CONTINUE
THE DOCKET CALL AND TRIAL DATE PENDING THE COURT’S
RULING ON DEFENDANT’S MOTIONS FOR SUMMARY JUDGMENT**

Ryanne McNeese (“Plaintiff”) and Defendant Lone Star College System (“Defendant”) (collectively, the “Parties”) file this Joint Motion to Postpone All Deadlines and to Continue the Docket Call and Trial Date Pending the Court’s Ruling on Defendant’s Motions for Summary Judgment.

NATURE AND STAGE OF THE PROCEEDING

Plaintiff filed this lawsuit on August 15, 2016. Defendant removed it to this Court on September 16, 2016. Plaintiff contends Lone Star retaliated against her for engaging in protected activity, in alleged violation of Title VII of the Civil Rights Act of 1964 (“Title VII”). Defendant timely filed its motion for summary judgment regarding Plaintiff’s claim on November 30, 2017. (Dkt No. 13) Plaintiff filed a response on December 7, 2017. (Dkt No. 14) Defendant filed a reply on December 14, 2017. (Dkt. No. 15) The deadline for filing the Joint Pretrial Order is January 29, 2018. Docket call is set for February 2, 2018. Trial is set for February 5, 2018. Defendant’s Motion for Summary Judgment is still pending.

POSTPONEMENT/EXTENSION REQUESTED

The Parties respectfully request that the Court postpone all deadlines, including the deadlines for filing of the joint pretrial order, and respectfully request that the Court postpone docket call and trial until after the Court has ruled on Defendant's Motion for Summary Judgment. The Parties also request that, if any part of this case remains after the Court rules on Defendant's Motions for Summary Judgment, they be given at least twenty-one days from the date of entry of the Court's ruling on Defendant's Motion for Summary Judgment to file the joint pretrial order. This postponement is not sought to unduly delay this case but so that justice may be served.

CONCLUSION

For these reasons, the Parties respectfully request that this motion be granted and that the Court will postpone docket call, trial, and the deadline for filing a joint pretrial order until after the Court rules on Defendant's Motions for Summary Judgment.

Respectfully submitted,

/s/ Peter Costea

Peter Costea

Texas SBN: 04855900

4544 Post Oak Place, Suite 350

Houston, Texas 77027

713-337-4304 (Phone)

713-237-0401 (Fax)

peter@costealaw.com

**ATTORNEY FOR PLAINTIFF
RYANNE MCNEESE**

/s/ Stephen J. Quezada
Stephen J. Quezada
Ogletree, Deakins, Nash,
Smoak & Stewart, P.C.
Texas SBN: 24076195
One Allen Center
500 Dallas St., Ste. 3000
Houston, Texas 77002
713-655-0855 (Phone)
713-655-0020 (Fax)
stephen.quezada@ogletreedeakins.com

**ATTORNEY FOR DEFENDANT
LONE STAR COLLEGE SYSTEM**

CERTIFICATE OF SERVICE

This is to certify that on January 19, 2018, a true and correct copy of the foregoing document has been served on all counsel of record via the Electronic Case Filing system.

Peter Costea
4544 Post Oak Place, Suite 350
Houston, Texas 77027
713-337-4304 (Phone)
713-237-0401 (Fax)
peter@costealaw.com

**ATTORNEY FOR PLAINTIFF
RYANNE MCNEESE**

/s/ Stephen J. Quezada
Stephen J. Quezada